

Exhibit A

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

SALERNO MEDICAL ASSOCIATES, LLP,)
SENIOR HEALTHCARE OUTREACH)
PROGRAM, INC., and SM MEDICAL LLC,)
individually and on behalf of all others similarly)
situated,)

Plaintiffs,)

Case No. 2:20-cv-10539 (KM)

v.)

RIVERSIDE MEDICAL MANAGEMENT, LLC,)
UNITED HEALTHCARE COMMUNITY PLAN,)
INC., OPTUM, INC., OPTUM CARE, INC.,)
UNITEDHEALTH GROUP, INC.,)
UNITEDHEALTHCARE INSURANCE)
COMPANY and JOHNS DOE 1-20,)

Defendants.)

DECLARATION OF MICHELE NIELSEN

My name is Michele Nielsen. I am more than eighteen years old. I have personal knowledge of the following facts or have learned those facts by reviewing the defendants' business records kept in the ordinary course of business.

1. I am Vice President and Market Lead New Jersey Networks for UnitedHealthcare Insurance Company. I have worked for United for 13 years.

2. I submit this declaration in support of the defendants' combined motion to dismiss for lack of personal jurisdiction, motion to compel arbitration, and alternatively, motion to dismiss for failure to state a claim.

3. UnitedHealthcare Insurance Company is a Connecticut corporation with its principal place of business in Hartford, Connecticut.

4. UnitedHealthcare Community Plan, Inc. is a Michigan corporation with its principal place of business in Southfield, Michigan.

5. Optum, Inc. is a Delaware corporation with its principal place of business in Eden Prairie, Minnesota.

6. Optum Care, Inc. is a Delaware corporation with its principal place of business in Minnetonka, Minnesota.

7. UnitedHealth Group, Inc. is a Delaware corporation with its principal place of business in Minneapolis, Minnesota. UnitedHealth Group, Inc. is the ultimate parent company for UnitedHealthcare Insurance Company, UnitedHealthcare Community Plan, Inc., Optum, Inc., and Optum Care, Inc.

8. The plaintiffs originally named “Riverside Medical Group, LLC” as a defendant. That legal entity—if it exists—is not part of UnitedHealth Group, Inc.’s corporate family and is not otherwise affiliated with any defendant. I am also not familiar with any legal entity that goes by that name.

9. “Riverside Medical Management, LLC” is part of UnitedHealth Group, Inc.’s corporate family. Riverside Medical Management is a limited liability company formed in Delaware. Riverside Medical Management’s sole member (100% owner) is ProHEALTH Medical Management, LLC. ProHEALTH is a Delaware LLC, and its sole member (100% owner) is Collaborative Care Holdings, LLC, which is a Delaware LLC. Collaborative Care Holdings’ sole member (100% owner) is OptumHealth Holdings, LLC, which is a Delaware LLC. OptumHealth Holdings’ sole member (100% owner) is Optum, Inc., which is a Delaware corporation with a principal place of business in Eden Prairie, Minnesota.

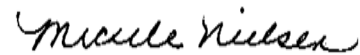
10. I have attached as exhibits true and correct copies of the Plaintiffs’ providers’ contracts with UnitedHealthcare Insurance Company.

11. Oxford Health Plans (NJ), Inc. administers United’s dual-complete plan in New Jersey that includes both Medicare and Medicaid benefits, and Oxford Health Plans (NJ) contracts with those plan members. AmeriChoice of New Jersey, Inc. administers United’s traditional Medicaid plans in New Jersey and contracts with those plan members. Those entities sometimes do business under the trade name “UnitedHealthcare Community Plan,” but the legal entity named

“UnitedHealthcare Community Plan, Inc.”—a Michigan corporation—does not administer Medicaid products in New Jersey.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on September 22, 2020.

A handwritten signature in black ink, reading "Michele Nielsen". The signature is written in a cursive, flowing style.

Michele Nielsen